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UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
RIVERSIDE DIVISION

In re MICHAEL ANTHONY SANDOVAL
Debtor.

Case No. 6:24-bk-15038-SY

Chapter 7

NIPPON LIFE INSURANCE COMPANY OF
AMERICA,

Plaintiff,

v.

MICHAEL ANTHONY SANDOVAL,
Defendant.

Adv. 6:24-ap-01092-SY

**STIPULATION TO CONTINUE STATUS
CONFERENCE AND HEARING ON
DEFENDANT'S MOTION TO DISMISS
ADVERSARY COMPLAINT**

Current Date: July 31, 2025
Proposed Date: September 4, 2025
Time: 9:30 a.m.
Place: 3420-12th, Riverside, CA
Courtroom: 302

1 TO THE HONORABLE SCOTT H. YUN, U.S. BANKRUPTCY JUDGE:
2 Defendant, MICHAEL ANTHONY SANDOVAL (“Defendant”), and Plaintiff, NIPPON
3 LIFE INSURANCE COMPANY OF AMERICA (“Plaintiff”), by and through their counsel of
4 record, hereby stipulate and agree to the following facts:

5 1. Plaintiff’s adversary proceeding against Defendant was filed December 12, 2024.
6 2. Default was entered against the Defendant on January 22, 2025 (ECF 12).
7 3. Defendant retained Baruch Cohen on January 22, 2025.
8 4. Mr. Cohen requested that Plaintiff agree to set aside the Default, which Plaintiff agreed
9 to so pending settlement discussions between the Parties.

10 5. By Stipulation dated February January 29, 2025, the Parties filed a Stipulation to Set
11 Aside the Default, which the Court entered on February 6, 2025 (ECF 27).

12 6. By Order dated February 1, 2025, the Court scheduled the Initial Status Conference for
13 March 26, 2025 (ECF 20);

14 7. On February 3, 2025, Defendant filed a Motion to Dismiss the Adversary Complaint
15 filed by Plaintiff (ECF 21), which was fully briefed (ECF 43 and 44) and heard on April 23, 2025
16 (ECF 47);

17 8. By Order dated April 29, 2025, the Court granted the Motion with Leave to Amend
18 (ECF 49). Plaintiff timely filed an Amended Complaint and Defendant timely filed a Motion to
19 Dismiss (ECF 51 and 53);

20 9. The hearing on Defendant’s Motion and Continued Status Conference are set for July
21 31, 2025 (ECF 54);

22 10. Mr. Wax Jacobs, lead counsel for Plaintiff with primary responsibility for handling this
23 matter was recently in an accident and suffered serious injuries. As a result, Mr. Wax Jacobs is
24 unable to timely complete the opposition to the pending motion. Local counsel for Plaintiff
25 requested that the parties agree to continue the current Status Conference and Hearing on
26 Defendant’s pending motion to September 4, 2025, and that any opposition and reply papers be
27 due based on the continued hearing date. Mr. Cohen kindly agreed to the requested continuance.

1 NOW, THEREFORE, the Parties Stipulate and Agree as follows:

2 The Continued Status Conference and the hearing on Defendant's Motion shall be
3 continued to September 4, 2025 or such other date the Court deems appropriate. Any opposition
4 and reply papers for the Motion shall be due and filed based on the continued hearing date.

5 IT IS SO STIPULATED.

6
7 Dated: July 8, 2025

MAYNARD NEXSEN LLP

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9 By: /s/ Misty A. Murray
MISTY A. MURRAY
Attorneys for Plaintiff
Nippon Life Insurance Company of
10 America

11 Dated: July 8, 2025

LAW OFFICES OF BARUCH C. COHEN
APC

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13 By: /s/ Baruch C. Cohen
BARUCH C. COHEN
Attorneys for Defendant
Michael Anthony Sandoval
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